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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**SAMMER ZAKHOUR AND  
JOHN MARTINEZ;  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiff,

v.

**THE ISOPURE COMPNAY,  
LLC,**

Defendant.

**Case No.: 3:15-cv-02512-CAB-NLS**

**JOINT STIPULATION TO  
DISMISS**

**Judge:** Hon. Cathy Ann Bencivengo

**Mag. Judge:** Hon. Nita L. Stormes

1 IT IS HEREBY STIPULATED AND AGREED by and between plaintiffs  
2 Sammer Zakhour and John Martinez and defendant The Isopure Company, LLC,  
3 and their respective counsel, that the above-captioned action is voluntarily  
4 dismissed in its entirety, WITHOUT PREJUDICE as to all defendants, pursuant to  
5 Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure; each side is to bear  
6 their own fees and costs.  
7

8 Respectfully submitted,

9 **KAZEROUNI LAW GROUP, APC**

10 Date: March 21, 2016

By: /s/ Abbas Kazerounian

11 Abbas Kazerounian

12 *Attorney for Plaintiffs*  
13  
14

15 Date: March 21, 2016

**REED SMITH, LLP**

16 By: /s/ Thomas Evans

17 Thomas A. Evans

18 *Attorney for Defendant*

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